



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

**REGION 8, MONTANA OFFICE
FEDERAL BUILDING, 301 S. PARK, DRAWER 10096
HELENA, MONTANA 59626-0096**

Ref: 8MO

March 30, 2000

Mr. Thomas J. Clifford, Forest Supervisor
Helena National Forest
2880 Skyway Drive
Helena, MT 59601

and

Mr. Richard M. Hotaling, Butte Field Manager
Butte Field Office
P.O. Box 3388
Butte, MT 59702

Re: Clancy-Unionville Vegetation Manipulation and Travel
Management Project Final Environmental Impact
Statement

Dear Mr. Clifford and Mr. Hotaling:

In accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act, the Environmental Protection Agency, Region VIII, Montana Office (EPA) reviewed the above-referenced Final Environmental Impact Statement (FEIS).

The EPA supports efforts of the U.S. Forest Service (USFS) and Bureau of Land Management (BLM) to restore more desirable forest and grassland conditions and to reduce wildfire risk in the Clancy-Unionville project area, while also implementing fish and watershed rehabilitation projects (i.e., road obliteration and revegetation), and preventing spread of noxious weeds and protecting wildlife security and habitat with a restrictive motorized vehicle access policy. EPA does not object to the USFS's vegetation treatment preferred alternative consisting of Alternative C (with several additions from Alternatives A and D), nor to the BLM's vegetation treatment Alternative A. We recognize that resource trade-offs are involved in land management decisions. EPA endorses the minimal construction of only temporary roads with the preferred alternatives for vegetation treatment. We support the USFS and BLM travel management alternatives (from Alternative D) involving closing and rehabilitating

existing roads and placing additional road restrictions to improve wildlife security, watershed conditions and fisheries.

The EPA is concerned about the minimal levels of aquatic monitoring that are proposed to determine aquatic and hydrologic effects of vegetation treatments and road management. EPA believes that aquatic and hydrologic monitoring is a necessary and crucial element in identifying and understanding the aquatic/hydrologic impacts of management actions, and should be an integral part of project implementation. Monitoring and feedback of monitoring results to managers is critical to the success of a land management plan. It is only through monitoring of aquatic/hydrologic effects that the USFS and BLM will be able to determine whether aquatic goals and objectives are being met.

Appendix B, identifying proposed monitoring for the Clancy-Unionville project, indicates that the USFS proposes to monitor impacts to stream morphology at two stream cross sections and will conduct stream substrate core sampling to determine sediment effects. The BLM does not propose to carry out any aquatic or hydrologic monitoring. We consider the level of monitoring proposed by the USFS to be minimal, and the level of monitoring proposed by the BLM, to be inadequate to determine the aquatic and hydrologic effects of management actions.

We realize that USFS and BLM monitoring budgets are limited, but we believe some level of aquatic monitoring should be carried out for a period of time after the timber harvests, burning and road management actions to assess actual effects of management actions on aquatic habitat and biota, and compare effects to project goals and objectives. Aquatic and hydrologic monitoring is needed to validate and document that BMPs effectively control sediment delivery from harvest and burn units, and protect beneficial uses. Aquatic monitoring is also helpful to quantify reduced sediment delivery associated with proposed mitigation and road obliteration and road closures, and validate predictions of overall sediment reductions from implementation of mitigation measures and road closures. Monitoring will also assist the State DEQ in developing TMDLs for Lump Gulch Creek and Clancy Creek.

The EPA supports improved monitoring for this project, and supports an increase in Forest Service and BLM monitoring resources to enable monitoring necessary to determine the impacts of agency actions to be carried out. The Vice President's Clean Water Action Plan indicates that Federal land and resource management agencies are to review existing processes to ensure that those processes (e.g., budget processes) adequately address water quality protection, monitoring, and compliance. The agencies are directed to revise and upgrade processes as needed by the year 2000. We believe that improved levels of monitoring and monitoring resources are needed by the BLM and USFS to obtain consistency with the Clean Water Action Plan.

In regard to prescribed burning, while the EPA supports the judicious use of prescribed fire to help restore ecosystem health, we believe that quantitative PM₁₀ emissions (tons/yr) should be disclosed to give the public and the decision-maker a more distinct comparison of PM₁₀ emissions for each alternative. Such information is lacking in the DEIS and FEIS.

The EPA appreciates the effort that went into the preparation of this FEIS, and we thank you for the opportunity for review and comment. If we may provide further explanation of our concerns please contact Mr. Steve Potts of my staff in Helena at (406) 441-1140 ext. 232.

Sincerely,

Original Signed by
John F. Wardell

John F. Wardell
Director
Montana Office

Enclosure

cc: Cynthia Cody/Yolanda Martinez, EPA, 8EPR-EP, Denver
Earl Sutton, Forest Service-Region 1, EAPS, Missoula
Stuart Lehman, MDEQ-Resource Protection & Planning Bureau, Helena
Cliff Walker, Forest Service-Region 1, TCFPM, Missoula
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